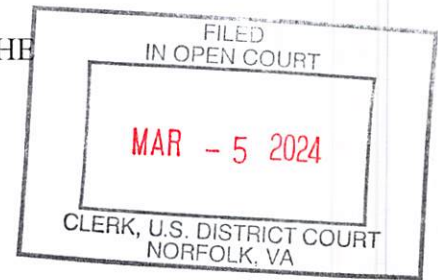


IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF VIRGINIA
Newport News Division



UNITED STATES OF AMERICA

v.

No. 4:24-cr-1

ACACIA IYANA JACKSON,
a/k/a "Dominant,"

Defendant.

STATEMENT OF FACTS

The United States and the defendant, ACACIA IYANA JACKSON (hereinafter, "the defendant"), agree that, if this matter had proceeded to trial, the United States would have proven the following facts beyond a reasonable doubt with admissible and credible evidence:

1. The defendant was a "First Lady" in a New York set of the Black P. Stone Nation ("BPSN") – a national street gang with different regional sets across the United States.

2. On or about May 6, 2023, the defendant conspired and joined together with four fellow BPSN gang members to kidnap T.M.

3. T.M. was the "Krown Princess," meaning she was the highest-ranking female of a BPSN set in Virginia, which referred to itself as the "Vietnam Blakk5tone Gorillas Tribe." She resided in Richmond, Virginia.

4. On May 6, 2023, at approximately 6:30 a.m., deputies with the York-Poquoson Sheriff's Office responded to the area of Old Williamsburg Road and Daniels Drive in York County and found the deceased body of T.M. She had been shot multiple times. Numerous shell casings with an "S&B" headstamp were found at the scene. She was found without shoes on, and she was not wearing a bra. She had visible injuries to her face.

A.J. [Signature]
[Signature]
[Signature]
[Signature]

5. In the days leading up to May 6, 2023, the defendant and her coconspirators, D.G., H.C., and J.L., determined that T.M. committed a gang infraction warranting a gang-related “beating.”

6. On the evening of May ~~5~~, 2023, the defendant and these three coconspirators drove from the Hampton Roads area to Richmond to carry out the “beating” of T.M.

7. While en route to Richmond on or about May ~~5~~, 2023, the defendant and her coconspirators had a flat tire. This delayed their arrival at T.M.’s residence until the early morning hours of May 6, 2023.

8. On or about May 5, 2023, at approximately 9:28 p.m., the defendant messaged T.M., “we otw to yah shii.” At approximately 10:43 p.m., the defendant messaged T.M., “Her tire got flat,” to which T.M. responded, “What’s t? Kause this shit out of the blue. Don’t beat around the bush. SAY WHAT IT ID AND WHAT IT AINT.” The defendant replied, “Wym that’s out of the blue fytb.” The victim replied with the following emoji: “🤔.” A few hours later, at approximately 1:15 a.m., the defendant messaged T.M., “Yooooooo,” and T.M. responded “You n[*****] was supposed to dub me last night.”

9. At approximately 1:14 a.m. on May 6, 2023, the defendant and three coconspirators arrived at T.M.’s residence located at **** Bethel Street in Richmond, Virginia.

10. From approximately 1:14 a.m. until they departed T.M.’s residence at approximately 1:38 a.m., the defendant and her coconspirators conducted a gang-related “beating” of T.M. The male leader of the gang, H.C., supervised while three female gang members including the defendant attacked T.M. for a specified period of time. T.M. suffered bruises to her face and body.

11. At approximately 1:38 a.m., the defendant and her coconspirators left T.M.'s residence and went to pick up a fifth coconspirator, J.J., who resided in Richmond.

12. At approximately 2:22 a.m., the defendant sent a screenshot of her earlier communications with T.M. to the leader of the conspiracy, including the message where T.M. sent a laughing emoji at being notified of the gang-related beating. This was viewed by the defendant and her coconspirators as a sign of disrespect to the gang.

13. At approximately 2:28 a.m., the defendant and her coconspirators returned to T.M.'s residence and kidnapped her. Some of the coconspirators were armed with firearms and wearing masks. The defendant and/or her coconspirators took T.M. by force and against her will from her residence to the vehicle where they departed the area at approximately 2:34 a.m., holding T.M. in a black Hyundai Sonata.

14. The defendant and her coconspirators used the black Hyundai Sonata bearing a Virginia license plate ending in 9340 registered to coconspirator G.G. to transport T.M. from her residence in Richmond during the early morning hours of May 6, 2023.

15. The defendant and her coconspirators transported T.M. via Interstate 64 to a remote area of York County, Virginia, by Old Williamsburg Road, for the purpose of holding T.M. under force and false pretenses and killing her.

16. At approximately 3:47 a.m., the defendant and/or her coconspirators removed T.M. from the vehicle and killed her, firing at least fourteen shots and striking T.M. eight times in the head abdomen, back, buttocks, and legs.

17. The defendant and her coconspirators kidnapped and killed T.M. to punish her for disrespecting the gang.

A-J sum
ser
DMC

18. The defendant and her coconspirators used cellular telephones to communicate with each other and the victim for the purpose of abducting and killing T.M.

19. Following the murder, the defendant and her coconspirators traveled back toward Richmond on Interstate 64. At approximately 4:32 a.m., they stopped at an Exxon gas station in Quinton, Virginia. During this period, coconspirator D.G. transferred approximately \$20 via the mobile payment service CashApp to the defendant. The defendant then transferred approximately \$20 to coconspirator J.L. At approximately 4:38 a.m., coconspirator J.L. made a card purchase for \$20.99, which is described on the statement as "NEW KENT EXXON."

20. The defendant and her coconspirators used the following facilities of interstate commerce in committing and in furtherance of the kidnapping: cellular telephones, an interstate highway, a firearm, ammunition, and mobile-payment services such as CashApp.

21. On May 7, 2023, the Norfolk Police Department located and stopped the aforementioned Hyundai Sonata. The defendant and two of her coconspirators, D.G. and J.L., were in the vehicle at the time. The vehicle was seized and searched pursuant to a warrant. Investigators recovered a 9mm cartridge from the vehicle with the same "S&B" headstamp from casings found at the scene of T.M.'s murder. Cellular telephones were also recovered.

22. The defendant knowingly, unlawfully and intentionally conspired and agreed with her coconspirators to unlawfully and willfully seize, confine, inveigle, decoy, kidnap, abduct, carry away, and hold T.M. for ransom, reward or otherwise, by means and facilities of interstate and foreign commerce.

23. The defendant stipulates and agrees that she committed the acts described herein unlawfully, knowingly, and willfully, and without legal justification or excuse with the specific intent to do that which the law forbids, and not by mistake, accident or any other reason. The defendant further acknowledges that the foregoing statement of facts does not describe all of her conduct relating to the offenses charged in this case, nor does it identify all of the people with whom she may have engaged in illegal activities.

Jessica D. Aber
United States Attorney

Date: March 5, 2024


By: _____



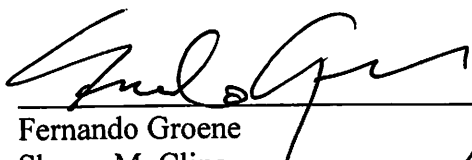
Lisa R. McKeel
D. Mack Coleman
Assistant U.S. Attorneys
Alyssa Levey-Weinstein
Special Assistant U.S. Attorney



Defendant's Signature: After consulting with my attorney and pursuant to the plea agreement entered into this day between the defendant, ACACIA IYANA JACKSON, and the United States, I hereby stipulate that the above Statement of Facts is true and accurate, and that had the matter proceeded to trial, the United States would have proved the same beyond a reasonable doubt.

Date: 3/5/24 
ACACIA IYANA JACKSON
Defendant

Defense Counsel's Signature: I am counsel for the defendant, ACACIA IYANA JACKSON, in this case. I have carefully reviewed the above Statement of Facts with the defendant. To my knowledge, the defendant's decision to stipulate to these facts is an informed and voluntary one.

Date: 3/5/2024 
Fernando Groene
Shawn M. Cline
Counsel for the Defendant 